

April 14, 2015

**Via ECF**

The Honorable Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Rm. N208  
Brooklyn, New York 11201

Re: *Gigantino v. Turner Construction, et al.*  
Civil No. 14-3619  
GS File No. 4106.0008

Dear Judge Reyes,

We represent Defendants Turner Construction Company and Delta Airlines, Inc. in the above-referenced Labor Law matter. We submit this joint letter on behalf of all parties requesting a modification of the current scheduling order pursuant to the Court's April 8, 2015, Order granting plaintiff's motion to compel.

The Court has Ordered that all liability fact depositions be completed by April 24, 2015, and all liability fact discovery be completed by May 6, 2015. The parties have extended the liability expert deadlines out from those two dates as set forth below and respectfully request that the Scheduling Order be modified as follows:

- Plaintiff's liability expert(s) witness disclosures are due on or before May 22, 2015.
- Plaintiff's liability expert(s) depositions shall be completed on or before June 5, 2015.
- Defendants' liability expert(s) witness disclosures are due on or before June 19, 2015.
- Defendants' liability expert(s) depositions shall be completed on or before July 2, 2015.
- A status conference with the Court will be held on \_\_\_\_\_.

We are available at the Court's convenience to discuss this matter further.

Respectfully submitted,  
Goldberg Segalla LLP

/s/ Laura Ashley Martin

Laura Ashley Martin

LAM

CC: Michael S. Fabiani, Esq. (via ECF)  
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